

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
10/23/1998	AC/WP/OP/JD	Faxed Letter	From client's counsel to Steve Gilman	Re: representation of T. Gene Gilman in connection with litigation
Undated	WP/OP/JD	Research Material with Attorney Notes thereon		Re: representation of T. Gene Gilman in connection with litigation
9/23/1998	AC/WP/JD	Facsimile	From Steve Gilman to client's counsel and Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
Undated	WP/JD	Computer Generated Report	Created by Steve Gilman for T. Gene Gilman	Re: representation of T. Gene Gilman in connection with litigation
9/22/1998	AC/WP/OP/JD	Letter	From client's counsel to Steve Gilman	Re: representation of T. Gene Gilman in connection with litigation
9/22/1998	WP/OP/JD	Draft Litigation Document	Draft by client's counsel	Re: representation of T. Gene Gilman in connection with litigation
9/21/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: representation of T. Gene Gilman in connection with litigation
9/18/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
9/22/1998	AC/WP/JD	Facsimile	From Steve Gilman to client's counsel and Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
9/22/1998	WP/OP/JD	Draft Correspondence with Attorney Notes thereon	Attorney Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
9/17/1998	AC/WP/OP/JD	Facsimile with Attorney Notes thereon	Fax from Steve Gilman to client's counsel; Attorney Notes thereon by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
Undated	WP/JD	Computer Generated Report	Created by client	Re: representation of T. Gene Gilman in connection with litigation
9/17/1998	WP/OP/JD	Faxed Letter	From client's counsel to Attorney Scoll with cc to T. Gene Gilman	Re: representation of T. Gene Gilman in connection with litigation
9/17/1998	WP/OP/JD	Draft Correspondence	Draft by client's counsel	Re: representation of T. Gene Gilman in connection with litigation
9/15/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman, Steve Gilman, and client's counsel re: representation of T. Gene Gilman in connection with litigation
9/11/1998	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
8/27/1998	AC/WP/OP/JD	Facsimile	From Attorney Scoll to client's counsel	Re: representation of T. Gene Gilman in connection with litigation (includes content of communication from Steve Gilman)
8/25/1998	AC/JD	Letter	From client's counsel to T. Gene Gilman with cc to Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
10/14/1997	AC/WP/JD	Letter	From T. Gene Gilman to outside counsel seeking legal advice	Re: representation of T. Gene Gilman in connection with litigation (includes summary of prior conversation between T. Gene Gilman and outside counsel)
Undated	WP/JD	Notes	By client	Re: representation of T. Gene Gilman in connection with litigation
10/24/1997	WP/JD	Notes	By client	Re: representation of T. Gene Gilman in connection with litigation

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
Undated	WP/OP/JD	Court Filing/Litigation Document with Attorney Notes thereon	Attorney Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
10/8/1997	WP/OP/JD	Correspondence with Attorney Notes thereon	Attorney Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
8/26/1997	WP/OP/JD	Court Filing with Attorney Notes thereon	Attorney Notes by Attorney Scoll	Re: representation of T. Gene Gilman in connection with litigation
2/18/2003	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: incorporation of business for T. Gene Gilman (personal legal)
9/9/1999	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Steve Gilman
9/7/1999	AC/JD	Facsimile	From Attorney Scoll to Steve Gilman	Re: personal legal matter for T. Gene Gilman and Steve Gilman
9/7/1999	AC/JD	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: personal legal matter for T. Gene Gilman and Steve Gilman
Undated	WP/OP/JD	Computer Generated Report with Attorney Notes thereon	Notes by Attorney Scoll	Report and Notes concerning personal legal matter for T. Gene Gilman and Steve Gilman
8/30/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman and Steve Gilman re: personal legal matter for T. Gene Gilman and Steve Gilman
8/13/1999	AC/JD	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: personal legal matter for T. Gene Gilman and Steve Gilman
8/13/1999	AC/JD	Facsimile	From Attorney Scoll to T. Gene Gilman and Steve Gilman	Re: personal legal matter for T. Gene Gilman and Steve Gilman
Undated	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Steve Gilman
8/13/1999	WP/OP/JD	Draft Letter with Attorney Notes thereon	From Attorney Scoll to opposing counsel	Re: personal legal matter for T. Gene Gilman and Steve Gilman
8/12/1999	WP/OP/JD	Draft Letter with Attorney Notes thereon	From Attorney Scoll to opposing counsel	Re: personal legal matter for T. Gene Gilman and Steve Gilman
8/12/1999	AC/WP/OP/JD	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: personal legal matter for T. Gene Gilman and Steve Gilman
8/13/1999	WP/OP/JD	Draft Letter with Attorney Notes thereon	From Attorney Scoll to opposing counsel	Re: personal legal matter for T. Gene Gilman and Steve Gilman
8/18/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: personal legal matter for T. Gene Gilman and Steve Gilman
8/16/1999	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Steve Gilman
8/11/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with Steve Gilman re: personal legal matter for T. Gene Gilman and Steve Gilman
8/10/1999	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Steve Gilman
Undated	WP/JD	Draft Correspondence	By T. Gene Gilman	Re: personal legal matter for T. Gene Gilman and Steve Gilman
8/12/1999	AC/WP/OP/JD	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: personal legal matter for T. Gene Gilman and Steve Gilman

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
8/12/1999	WP/OP/JD	Draft Correspondence	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Steve Gilman
8/9/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman and Steve Gilman
Undated	WP/OP/JD	Draft Legal Document	Created by Attorney Scoll	Re: personal legal matter for T. Gene Gilman
Undated	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on Draft Legal Document re: personal legal matter for T. Gene Gilman
Undated	AC/WP/OP/JD	Faxed Draft Legal Document with Notes to Attorney Scoll thereon	From Steve Gilman to Attorney Scoll	Re: personal legal matter for T. Gene Gilman
11/7/2002	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman
10/8/2002	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman
4/16/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: Strategic Capital Resources, Inc. Agreement
09/11/1998	WP/OP	Legal Document with Attorney Notes thereon	Attorney Notes by Attorney Scoll	Re: personal legal/business matter for T. Gene Gilman
9/1/1998	AC	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman re: personal legal/business matter for T. Gene Gilman
1/19/2000	WP/OP/JD	Correspondence with Attorney Notes thereon	Notes by Attorney Scoll	Re: personal legal/business matter for T. Gene Gilman
3/8/2000	WP/OP/JD	Draft Letter with Attorney Notes thereon	By Attorney Scoll	Re: personal legal/business matter for T. Gene Gilman
3/7/2000	WP/OP/JD	Draft Letter with Attorney Notes thereon	By Attorney Scoll	Re: personal legal/business matter for T. Gene Gilman
2/17/2000	AC/WP/JD	Email	From Attorney Scoll's other client (Apollo) to Attorney Scoll	Attorney-client privileged communication with separate client related to personal legal/business matter for T. Gene Gilman
1/4/1993	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: personal legal matter for T. Gene Gilman
12/7/1992	AC	Letter	From T. Gene Gilman to Attorney Scoll	Re: personal legal matter for T. Gene Gilman
12/7/1992	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes contain content of conference with T. Gene Gilman re: personal legal matter for T. Gene Gilman
6/19/1989	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: personal legal matter for T. Gene Gilman
5/9/1989	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman
1/8/1999	AC	Facsimile	From T. Gene Gilman to Attorney Scoll	Re: personal legal matter for T. Gene Gilman
1/8/1999	WP/OP	Draft Letter	Draft created by Attorney Scoll	Re: personal legal matter for T. Gene Gilman
1/7/1999	AC/WP	Facsimile	From T. Gene Gilman to Attorney Scoll	Notes faxed to Attorney Scoll re: personal legal matter for T. Gene Gilman
Undated	AC/WP/OP	Attorney Notes on notes provided by client to Attorney Scoll	By Attorney Scoll	Attorney Notes on notes by client re: personal legal matter for T. Gene Gilman
Undated	AC/WP	Faxed Notes	Fax from T. Gene Gilman to Attorney Scoll	Re: personal legal matter for T. Gene Gilman
8/26/1998	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: personal legal matter for T. Gene Gilman

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
9/1/1998	WP/OP	Draft Legal Document	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman
12/7/1998	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: personal legal matter for T. Gene Gilman
Undated	AC/WP/OP	Draft Legal Document	Draft sent to T. Gene Gilman by Attorney Scoll	Re: personal legal matter for T. Gene Gilman
7/5/1998	AC/WP/OP	Draft Legal Document with Attorney Notes thereon	Draft sent to T. Gene Gilman by Attorney Scoll	Re: personal legal matter for T. Gene Gilman
5/15/1991	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: general personal/business legal matter for T. Gene Gilman
7/22/1987	WP/O	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman
10/5/1987	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal matter for T. Gene Gilman
5/12/1987	AC	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman re: personal business/legal matters for T. Gene Gilman
9/8/1993	WP/OP	Attorney Notes	By Attorney Scoll	Re: personal legal/business matter for T. Gene Gilman
9/2/1999	WP	Attorney Notes	By Attorney Scoll	Re: personal legal/business matter for T. Gene Gilman

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FOR THE DISTRICT OF MASSACHUSETTS
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PRIVILEGE LOG FOR REQUEST # 20
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION	
1/4/1993	AC	Letter	From Attorney Scoll to T. Gene Gilman	Letter concerning Gilman Insurance Agency, Inc.	
12/7/1992	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning Gilman Insurance Agency, Inc. (notes include content of conference with T. Gene Gilman)	
10/5/1992	AC	Facsimile	From T. Gene Gilman to Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
10/5/1992	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
9/22/1992	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
9/21/1992	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
9/15/1992	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
8/25/1992	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
9/26/1990	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: Gilman Insurance Agency, Inc.	
8/8/1989	WP/OP	Attorney Notes on Draft Corporate Document	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
12/8/1989	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: Gilman Insurance Agency, Inc.	

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PRIVILEGE LOG FOR REQUEST # 21
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION	
1/4/1993	AC	Letter	From Attorney Scoll to T. Gene Gilman	Letter concerning Gilman Insurance Agency, Inc.	
12/7/1992	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning Gilman Insurance Agency, Inc. (notes include content of conference with T. Gene Gilman)	
10/5/1992	AC	Facsimile	From T. Gene Gilman to Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
10/5/1992	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
9/22/1992	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
9/21/1992	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
9/15/1992	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
8/25/1992	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
9/26/1990	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: Gilman Insurance Agency, Inc.	
8/8/1989	WP/OP	Attorney Notes on Draft Corporate Document	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
12/8/1989	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: Gilman Insurance Agency, Inc.	
6/19/1989	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: Gilman Insurance Agency, Inc.	
5/9/1989	WP/OP	Attorney Notes	By Attorney Scoll	Re: Gilman Insurance Agency, Inc.	

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PRIVILEGE LOG FOR REQUEST # 22
 OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
 DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION	
1/4/1993	AC	Letter	From Attorney Scoll to T. Gene Gilman	Letter concerning Gilman Insurance Agency, Inc.	
12/7/1992	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning Gilman Insurance Agency, Inc. (notes include content of conference with T. Gene Gilman)	
10/5/1992	AC	Facsimile	From T. Gene Gilman to Attorney Scoll	Re: Gilman Insurance Agency, Inc.	
9/26/1990	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: Gilman Insurance Agency, Inc.	
12/8/1989	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: Gilman Insurance Agency, Inc.	
6/19/1989	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: Gilman Insurance Agency, Inc.	

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PRIVILEGE LOG FOR REQUEST # 23
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION	
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: T. Gilman & Co. Ltd.	
5/15/1991	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: T. Gilman & Co. Ltd.	
9/26/1990	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: T. Gilman & Co. Ltd.	
5/16/1989	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: T. Gilman & Co. Ltd.	
Undated	WP/OP	Legal Research Materials with Attorney Notes thereon	By Attorney Scoll	Re: T. Gilman & Co. Ltd.	
Undated	WP/OP	Draft Corporate Document with Attorney Notes thereon	By Attorney Scoll	Re: T. Gilman & Co. Ltd.	

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PRIVILEGE LOG FOR REQUEST # 24

OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION	
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: T. Gilman & Co. Ltd.	
5/15/1991	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: T. Gilman & Co. Ltd.	
9/26/1990	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: T. Gilman & Co. Ltd.	
5/16/1989	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: T. Gilman & Co. Ltd.	
Undated	WP/OP	Legal Research Materials with Attorney Notes thereon	By Attorney Scoll	Re: T. Gilman & Co. Ltd.	
Undated	WP/OP	Draft Corporate Document with Attorney Notes thereon	By Attorney Scoll	Re: T. Gilman & Co. Ltd.	
2/28/2000	WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with client's counsel concerning T. Gilman & Co. Ltd.	
2/23/2000	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman and client's counsel re: T. Gilman & Co. Ltd.	
6/17/1998	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman and client's counsel re: T. Gilman & Co. Ltd.	

ELIZABETH R. STEFFENBERG V. T. GENE GILMAN, ET AL.
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PRIVILEGE LOG FOR REQUEST # 25
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

REDACTED	DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
	5/15/1991	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: T. Gilman & Co. Ltd.
	9/26/1990	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: T. Gilman & Co. Ltd.
	5/16/1989	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: T. Gilman & Co. Ltd.

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PRIVILEGE LOG FOR REQUEST # 26
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION	
7/6/1999	AC	Invoice	From Attorney Scoll to T. Gene Gilman	Invoice contains information on content of communication with Steve Gilman	
8/25/1999	AC/WP/JD	Faxed Document	Document faxed from Steve Gilman to Attorney Scoll	Fax contains notes from Steve Gilman to Attorney Scoll re: litigation involving Arbor Securities	
9/20/1999	AC/WP/OP/JD	Faxed Draft Correspondence	Draft Letter by Attorney Scoll with Attorney Notes thereon; Notes from Steve Gilman to Attorney Scoll written on document.	Contains Attorney Notes and communication from Steve Gilman to Attorney Scoll re: litigation involving Arbor Securities	
9/14/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes concerning conference with Steve Gilman re: Arbor Securities, Ltd.	
Undated	AC/WP/JD	Computer Generated Report with Notes thereon faxed to Attorney Scoll	From Steve Gilman to Attorney Scoll	Fax concerning Arbor Securities, Ltd.	

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PRIVILEGE LOG FOR REQUEST # 27
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
9/16/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman concerning Arbor Securities
9/14/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman concerning Arbor Securities
9/11/1999	AC/WP/OP/JD	Attorney Notes	By Attorney Scoll	Notes on meeting with T. Gene Gilman re: Arbor Securities, Ltd.

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PRIVILEGE LOG FOR REQUEST # 28
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
10/10/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with David West (TradeTek/Commonwealth Financial) mentioning Financial Links
10/6/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes include content of conference with Tim Hogan (agent/employee of Financial Links) concerning Financial Links
10/5/2000	WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning Financial Links
8/24/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Tim Hogan (agent of Financial Links)
Printed on 6/17/04	AC	Computer Generated Report	Created by Attorney Scoll	Client Billing Worksheet for Financial Links; contains content of conference with Aleke Msumba (agent of Financial Links)
Printed on 11/13/2003	AC	Computer Generated Report	Created by Attorney Scoll	Client Billing Worksheet for Financial Links; contains content of conference with Aleke Msumba (agent of Financial Links)
Notes Undated	WP/OP	Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	RE: Financial Links
10/4/2000	AC	Email	From Tim Hogan (Exec VP of Fin. Links) to T. Gene Gilman and Attorney Scoll	Re: Financial Links
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: Financial Links
3/27/2001	AC	Letter	From Attorney Scoll to Robert Brumbaugh of Financial Links, Inc.	Re: Financial Links
4/6/2001	AC	Letter	From Attorney Scoll's office to Robert Brumbaugh of Financial Links, Inc.	Re: Financial Links
4/6/2001	AC	Letter	From Attorney Scoll's office to Robert Brumbaugh of Financial Links, Inc.	Re: Financial Links
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Re: Financial Links
4/6/2000	AC	Facsimile	From David Cochran CPA (for Fin. Links?) to Attorney Scoll	Re: Financial Links
Undated	AC/WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Notes contain content of conference with Tim Hogan (agent of Fin. Links)
Undated	WP/OP	Draft Legal Document with	By Attorney Scoll	RE: Financial Links

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
		Attorney Notes thereon		
Printed on 6/17/04	AC	Computer Generated Report	Created by Attorney Scoll	Client Billing Worksheet; contains content of conference with Aleke Msumba related to Financial Links

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UNITED STATES DISTRICT COURT
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PRIVILEGE LOG FOR REQUEST # 29
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
10/10/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with David West (TradeTek/Commonwealth Financial) mentioning Financial Links
10/6/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes include content of conference with Tim Hogan (agent/employee of Financial Links) concerning Financial Links
10/5/2000	WP/OP	Attorney Notes	By Attorney Scoll	Notes concerning Financial Links
8/24/2000	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with Tim Hogan (agent of Financial Links)
7/6/2002	AC	Invoice	By Attorney Scoll	Invoice to T. Gene Gilman; invoice includes content of communication with T. Gene Gilman concerning Financial Links
8/16/1999	AC	Invoice	By Attorney Scoll	Invoice to Commonwealth Financial Holdings; invoice contains content of communication with T. Gene Gilman and client's counsel concerning Financial Links
7/6/1999	AC	Invoice	By Attorney Scoll	Invoice to Commonwealth Financial Holdings; invoice contains content of communication with T. Gene Gilman and client's counsel concerning Financial Links
2/4/1999	AC	Invoice	By Attorney Scoll	Invoice to G. Gilman c/o T. Gilman & Co., Ltd.
Printed on 11/13/2003	AC	Computer Generated Report	By Attorney Scoll	Client Billing Worksheet containing content of conference with T. Gene Gilman concerning Financial Links
3/30/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman concerning Financial Links
3/4/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman concerning Financial Links
Document dated 7/21/1999	WP/OP	Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Legal Document for Financial Links
7/13/1999	AC	Facsimile	From T. Gene Gilman to Attorney Scoll	Concerning matter related to Financial Links
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Legal Document related to Financial Links
8/13/1999	WP/OP	Facsimile	From Attorney Scoll to client's counsel (client Commonwealth Financial)	Re: Financial Links

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
7/23/1999	AC	Letter	From Attorney Scoll to T. Gene Gilman	Re: Financial Links
7/23/1999	AC	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Financial Links
7/21/1999	WP/OP	Attorney Notes	By Attorney Scoll	RE: telephone call with owner of Financial Links
7/21/1999	WP/OP	Attorney Notes	By Attorney Scoll	RE: Financial Links
7/20/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Financial Links
7/16/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Financial Links
7/22/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Financial Links
7/22/1999	WP/OP	Facsimile	From Attorney Scoll to client's counsel (client Commonwealth Financial)	RE: Financial Links
7/22/1999	AC/WP/OP	Draft correspondence to client with Attorney Notes thereon	By Attorney Scoll	Re: Financial Links
Undated	WP/OP	Computer Generated Report with Attorney Notes thereon	Notes by Attorney Scoll	Re: Financial Links
7/2/1999	AC/WP/OP	Facsimile	From Attorney Scoll to client's counsel (client Commonwealth Financial)	Fax contains content of communication from T. Gene Gilman re: Financial Links
7/1/1999	AC	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Financial Links
7/1/1999	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman	Re: Financial Links
7/1/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes of conference with T. Gene Gilman concerning Financial Links
7/1/1999	WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
3/1/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Financial Links
Undated	WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
2/25/1999	WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
2/25/1999	WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
2/25/1999	AC	Attorney Notes	By Attorney Scoll	RE: Financial Links
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Notes on conference with Steve Gilman (concerning Financial Links)
2/12/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Financial Links
2/1/1999	AC	Email	From T. Gene Gilman to Attorney Scoll	Re: Financial Links
2/5/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
2/5/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Financial Links

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
			Gilman	
Undated	WP/OP	Draft Legal Document	By Attorney Scoll	Re: Financial Links
2/11/1999	WP/OP/JD	Attorney Notes	By Attorney Scoll	Re: Financial Links
2/8/1999	AC/WP	Facsimile with attached Correspondence and Legal Document with Notes thereon	From T. Gene Gilman to Attorney Scoll	Re: Financial Links
2/4/1999	WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
Undated	WP/OP	Faxed Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: Financial Links
Undated	WP/OP	Legal research materials	By Attorney Scoll	Re: Financial Links
2/2/1999	WP/OP	Computer Generated Reports with Attorney Notes thereon	By Attorney Scoll	RE: Financial Links
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Re: Financial Links
1/27/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
2/3/1999	WP/OP	Attorney Notes	By Attorney Scoll	RE: Financial Links
2/1/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
2/1/1999	WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
1/29/1999	WP/OP	Attorney Notes	By Attorney Scoll	RE: Financial Links
1/26/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Financial Links
Undated	WP/OP	Document with Attorney Notes thereon	By Attorney Scoll	Re: Financial Links
1/13/1999	WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Re: Financial Links
Printed on 6/17/04	AC	Computer Generated Report	Created by Attorney Scoll	Client Billing Worksheet for Financial Links; contains content of conference with Aleke Msumba
Notes Undated	WP/OP	Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	RE: Financial Links
10/4/2000	AC	Email	From Tim Hogan (Exec VP of Fin. Links) to T. Gene Gilman and Attorney Scoll	Re: Financial Links
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	Notes by Attorney Scoll	Re: Financial Links
3/27/2001	AC	Letter	From Attorney Scoll to Robert Brumbaugh of Financial Links, Inc.	Re: Financial Links
4/6/2001	AC	Letter	From Attorney Scoll's office to Robert Brumbaugh of Financial Links, Inc.	Re: Financial Links
4/6/2001	AC	Letter	From Attorney Scoll's office to	Re: Financial Links

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
Undated			Robert Brumbaugh of Financial Links, Inc.	
4/6/2000	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Re: Financial Links
Undated	AC	Facsimile	From David Cochran CPA to Attorney Scoll	Re: Financial Links
Undated	AC/WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	Notes contain content of conference with Tim Hogan (agent of Fin. Links)
Undated	WP/OP	Draft Legal Document with Attorney Notes thereon	By Attorney Scoll	RE: Financial Links
Printed on 6/17/04	AC	Computer Generated Report	Created by Attorney Scoll	Client Billing Worksheet; contains content of conference with Aleke Msumba related to Financial Links
8/8/2002	AC	Invoice	From Attorney Scoll to Commonwealth Financial Holdings	Invoice contains information concerning communications with T. Gene Gilman
Printed on 11/13/2003	AC	Computer Generated Report	Created by Attorney Scoll	Client Billing Worksheet for Financial Links; contains content of conference with Aleke Msumba (agent of Financial Links)

ELIZABETH R. STEFFENBERG V. T. GENE GILMAN, ET AL.
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
Civil Action No.: 04-40113 NMG

PRIVILEGE LOG FOR REQUEST # 30
OF PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT, DAVID M. SCOLL

AC = attorney client privilege; WP = work product; OP = opinion work product; JD = joint defense privilege

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
7/6/2002	AC	Invoice	By Attorney Scoll	Invoice to T. Gene Gilman; invoice includes content of communication with T. Gene Gilman concerning Financial Links
8/16/1999	AC	Invoice	By Attorney Scoll	Invoice to Commonwealth Financial Holdings; invoice contains content of communication with T. Gene Gilman and client's counsel concerning Financial Links
7/6/1999	AC	Invoice	By Attorney Scoll	Invoice to Commonwealth Financial Holdings; invoice contains content of communication with T. Gene Gilman and client's counsel concerning Financial Links
2/4/1999	AC	Invoice	By Attorney Scoll	Invoice to G. Gilman c/o T. Gilman & Co., Ltd.
Printed on 11/13/2003	AC	Computer Generated Report	By Attorney Scoll	Client Billing Worksheet containing content of conference with T. Gene Gilman concerning Financial Links
3/30/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman concerning Financial Links
3/4/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes include content of conference with T. Gene Gilman concerning Financial Links
7/13/1999	AC	Facsimile	From T. Gene Gilman to Attorney Scoll	Gilman concerning Financial Links
7/23/1999	AC	Letter	From Attorney Scoll to T. Gene Gilman	Concerning matter related to Financial Links
7/23/1999	AC	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Financial Links
7/20/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	RE: Financial Links
7/16/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes on conference with T. Gene Gilman concerning Financial Links
7/22/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Notes on conference with T. Gene Gilman concerning Financial Links
7/22/1999	AC/WP/OP	Draft correspondence to client with Attorney Notes thereon	By Attorney Scoll	Re: Financial Links
7/22/1999	AC/WP/OP	Facsimile	From Attorney Scoll to client's counsel (client Commonwealth Financial)	Re: Financial Links
7/22/1999	AC/WP/OP	Facsimile	From Attorney Scoll to client's counsel (client Commonwealth Financial)	Fax contains content of communication from T. Gene Gilman re: Financial Links

DATE	PRIVILEGE	DOCUMENT TYPE	PARTIES	DESCRIPTION
7/1/1999	AC	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Financial Links
7/1/1999	AC/WP/OP	Letter	From Attorney Scoll to T. Gene Gilman	Re: Financial Links
7/1/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Notes of conference with T. Gene Gilman concerning Financial Links
3/1/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Financial Links
2/12/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	RE: Financial Links
2/1/1999	AC	Email	From T. Gene Gilman to Attorney Scoll	Re: Financial Links
2/5/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
2/5/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Financial Links
2/8/1999	AC/WP	Facsimile with attached Correspondence and Legal Document with Notes thereon	From T. Gene Gilman to Attorney Scoll	Re: Financial Links
1/27/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
2/1/1999	AC/WP/OP	Attorney Notes	By Attorney Scoll	Re: Financial Links
1/26/1999	AC/WP/OP	Facsimile	From Attorney Scoll to T. Gene Gilman	Re: Financial Links